

## **EXHIBIT A**

Court of Common Pleas of Philadelphia County  
Trial Division  
**Civil Cover Sheet**

PLAINTIFF'S NAME  
KEVIN JACKSON

PLAINTIFF'S ADDRESS  
2843 BENNER STREET  
PHILADELPHIA PA 19149

PLAINTIFF'S NAME  
DONNA JACKSON

PLAINTIFF'S ADDRESS  
2843 BENNER STREET  
PHILADELPHIA PA 19149

PLAINTIFF'S NAME

PLAINTIFF'S ADDRESS

For Prothonotary Use Only (Docket Number)

**AUGUST 2013**  
E-Filed Number: 1308005722

**000542**

DEFENDANT'S NAME  
BEST BUY CO., INDIVIDUALLY, ALIAS: BEST BUY

DEFENDANT'S ADDRESS  
9940 ROOSEVELT BOULEVARD  
PHILADELPHIA PA 19115

DEFENDANT'S NAME  
BEST BUY

DEFENDANT'S ADDRESS  
9940 ROOSEVELT BOULEVARD  
PHILADELPHIA PA 19115

DEFENDANT'S NAME

DEFENDANT'S ADDRESS

TOTAL NUMBER OF PLAINTIFFS

2

TOTAL NUMBER OF DEFENDANTS

2

COMMENCEMENT OF ACTION

- ☒ Complaint ☐ Petition Action ☐ Notice of Appeal  
☐ Writ of Summons ☐ Transfer From Other Jurisdiction

AMOUNT IN CONTROVERSY

- ☐ \$50,000.00 or less  
☒ More than \$50,000.00

COURT PROGRAMS

- ☐ Arbitration  
☐ Jury  
☒ Non-Jury  
☐ Other:

- ☐ Mans Tort  
☐ Savings Action  
☐ Petition

- ☐ Commerce  
☐ Minor Court Appeal  
☐ Statutory Appeals

- ☐ Settlement  
☐ Minors  
☐ W/D/Survival

CASE TYPE AND CODE

2S - PREMISES LIABILITY, SLIP/FALL

STATUTORY BASIS FOR CAUSE OF ACTION

RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)

**FILED  
PROPROTHY  
AUG 08 2013  
S. GARRETT**

IS CASE SUBJECT TO  
COORDINATION ORDER?  
YES NO

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: KEVIN JACKSON, DONNA JACKSON

Papers may be served at the address set forth below.

NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY

SALVATORE LARUSSA

PHONE NUMBER

(215) 563-4440

FAX NUMBER

(215) 563-4448

ADDRESS

8 PENN CENTER, STE 1900  
1628 JFK BLVD.  
PHILADELPHIA PA 19103

SUPREME COURT IDENTIFICATION NO.

67038

E-MAIL ADDRESS

sslarussajr@aol.com

SIGNATURE OF FILING ATTORNEY OR PARTY

SALVATORE LARUSSA

DATE SUBMITTED

Thursday, August 08, 2013, 09:55 am

FINAL COPY (Approved by the Prothonotary Clerk)

**LAW OFFICES OF  
STEPHEN W. BRUCCOLERI**

BY: Salvatore LaRusa Jr., Esquire  
IDENTIFICATION NO.: 67038  
Eight Penn Center, Suite 1900  
1628 John F. Kennedy Boulevard  
Philadelphia, PA 19103  
(215) 563-4440

ATTORNEY FOR PLAINTIFF

Filed and Accepted by

PROTHONOTARY  
08 AUG 2013 09:55 AM

KEVIN JACKSON AND  
DONNA JACKSON, H/W.  
2843 Benner Street  
Philadelphia, PA 19149

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY  
CIVIL TRIAL DIVISION

AUGUST TERM, 2013

VS.

NO.

BEST BUY CO., INC., INDIVIDUALLY  
AND D/B/A "BEST BUY"  
9940 ROOSEVELT BLVD.  
PHILADELPHIA, PA 19115

AND

BEST BUY  
9940 ROOSEVELT BLVD.  
PHILADELPHIA, PA 19115

**CIVIL ACTION COMPLAINT  
2S - PREMISES LIABILITY**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERENCE SERVICE  
One Reading Center  
Philadelphia, PA 19107  
(215) 238-1701

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL

One Reading Center  
Philadelphia, PA 19107  
(215) 238-1701

Case ID: 130800542

LAW OFFICES OF STEPHEN W. BRUCCOLERI  
 BY: SALVATORE LARUSSA JR., ESQUIRE  
 ATTORNEY I.D.# 67038  
 EIGHT PENN CENTER, SUITE 1900  
 1628 JFK BLVD.  
 PHILADELPHIA, PA 19103  
 (215) 563-4440  
 Attorney for Plaintiffs

MAJOR NON-JURY

KEVIN JACKSON AND	:	COURT OF COMMON PLEAS
DONNA JACKSON, H/W.	:	PHILADELPHIA COUNTY
2843 Benner Street	:	CIVIL TRIAL DIVISION
Philadelphia, PA 19149	:	
	:	AUGUST TERM, 2013
VS.	:	
	:	NO.
BEST BUY CO., INC. , INDIVIDUALLY	:	
AND D/B/A "BEST BUY"	:	
9940 ROOSEVELT BLVD.	:	
PHILADELPHIA, PA 19115	:	
AND	:	
BEST BUY	:	
9940 ROOSEVELT BLVD.	:	
PHILADELPHIA, PA 19115	:	

1. Plaintiff, Kevin Jackson, is an individual citizen and resident of the Commonwealth of Pennsylvania, County of Philadelphia, residing therein at 2843 Benner Street, Philadelphia, PA 19149 who at all times material hereto was a lawful business invitee at Defendant's place of business commonly known as Best Buy.

2. Plaintiff, Donna Jackson, is an individual citizen and resident of the Commonwealth of Pennsylvania, County of Philadelphia, residing therein at 2843 Benner Street, Philadelphia, PA 19149 who at all times material hereto resided with and was married to Plaintiff, Kevin Jackson.

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3. Defendant, Best Buy Co., Inc., Individually and doing business as "Best Buy", is a corporation and/or business entity organized and existing by virtue of the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 9940 Roosevelt Blvd., Philadelphia, Pennsylvania 19115, which Defendant at all times material hereto owned, controlled, maintained and/or managed the premises where Plaintiff, Kevin Jackson, was injured on August 20, 2011.

4. Defendant, Best Buy, is a corporation and/or business entity organized and existing by virtue of the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 9940 Roosevelt Blvd., Philadelphia, Pennsylvania 19115, which Defendant at all times material hereto owned, controlled, maintained and/or managed the premises where Plaintiff, Kevin Jackson, was injured on August 20, 2011.

#### COUNT I

#### KEVIN JACKSON VS. BEST BUY CO., INC., INDIVIDUALLY

#### AND D/B/A "BEST BUY" AND BEST BUY

#### NEGLIGENCE

5. Plaintiff, Kevin Jackson, hereby incorporates by reference, paragraphs one (1) through four (4) of Plaintiff's Complaint, inclusively, as though fully set forth herein at length.

6. On or about August 20, 2011 at approximately 3:00 p.m., Plaintiff, Kevin Jackson, while a lawful business invitee at the Defendants business premises commonly known as Best Buy located at 9940 Roosevelt Blvd, Philadelphia 19115, was walking at or near the electronics aisle with a sales associate when he was suddenly and without warning caused to fall over a flat bed cart that was negligently left and/or mal-positioned in the aisle way, thereby causing Plaintiff, Kevin Jackson, to sustain serious and permanent injuries which will hereinafter

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be more fully described.

7. The aforementioned incident was caused solely by the negligence of the aforementioned Defendants, their agents, servants, workmen and/or employees, which negligence and carelessness of the Defendants their agents, servants, workmen and/or employees consisted of the following:

(a) allowing a dangerous and defective condition to exist about the subject aisle way of the business premises which the Defendant knew, or reasonably should have known existed well prior to the time of Plaintiff's accident;

(b) failing to warn business invitees of the dangerous condition that existed about the aisle which the Defendants knew or reasonably should have known would present a foreseeable risk of harm to business invitees such as Plaintiff;

(c) failing to properly remove the subject cart and remedy the dangerous and hazardous condition that existed about the aisle area which the Defendants knew or reasonably should have known would present a foreseeable risk of harm to business invitees such as Plaintiff;

(d) failing to properly inspect and/or monitor the subject business premises which would have revealed the defective and dangerous condition that caused Plaintiff's injuries at the time of the subject accident;

(e) failing to properly maintain the subject premises in a reasonably safe condition for business invitees such as Plaintiff;

8. As a result of the aforementioned incident Plaintiff, Kevin Jackson, was caused to sustain serious and permanent injuries in, on and about his person including, but not limited to, cervical strain and sprain with traumatic symptomatic aggravation of pre-existing cervical

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degenerative disc disease, moderate central disc herniation at C3-4 with cord compression, C5-6 central disc protrusion, C6-7 broad based right central disc protrusion with annular tear, thoracic strain and sprain, lumbosacral strain and sprain with traumatic symptomatic aggravation of pre-existing lumbar degenerative disc disease, bilateral trapezius sprain and strain, bilateral knee sprain and strain/contusion, bilateral carpal tunnel syndrome and left arm/elbow contusion; all of which have caused him and will continue to cause him a great deal of pain, suffering and inconvenience, and all of which are permanent in nature and character.

9. As a result of the aforementioned incident and resultant injuries, Plaintiff, Kevin Jackson, has been caused to expend various sums of money for medicine and medical attention in an effort to treat and cure himself of his injuries and to have essential services performed during the duration of his physical impairment, all to his great financial detriment and loss.

10. As a further result of the aforementioned incident and resultant injuries, Plaintiff, Kevin Jackson, has been prevented from attending to his usual and customary duties, avocations and occupations, thereby causing him to sustain a loss of earnings and/or earning capacity, all to his great financial detriment and loss.

WHEREFORE, Plaintiff, Kevin Jackson, hereby demands judgment in his favor and against Defendants, Best Buy Co., Inc, Individually and d/b/a "Best Buy" and Best Buy, for an amount in excess of Fifty Thousand Dollars (\$50,000.00) plus interest, attorney fees, the costs of suit and such other relief as the Court may deem just and proper.

COUNT II

**DONNA JACKSON VS. BEST BUY CO., INC., INDIVIDUALLY**

**AND D/B/A "BEST BUY" AND BEST BUY**

LOSS OF CONSORTIUM

11. Plaintiff, Donna Jackson, hereby incorporates by reference hereto paragraphs one (1) through ten (10), inclusively, as if the same were fully set forth herein at length.

12. As a result of the aforementioned injuries sustained by Plaintiff, Kevin Jackson, as a sole result of the negligence of the Defendants, Plaintiff, Donna Jackson, has been damaged in that she has been and will continue to be deprived of the aid, comfort, companionship, services and consortium of her husband, Plaintiff, Kevin Jackson, and has been forced to expend various sums of money for medicine and medical attention in an effort to treat and cure her husband of his injuries, and to have essential services performed during the duration of his physical impairment, all to her great financial detriment and loss.

Wherefore, Plaintiff, Donna Jackson, h/w, hereby demands judgment in her favor and against Defendants, Best Buy Co., Inc., Individually and d/b/a "Best Buy" and Best Buy, for an amount in excess of Fifty Thousand Dollars (\$50,000.00) plus interest, the costs of suit, attorney fees' and such other further relief as the Court deems just and proper.

LAW OFFICES OF  
STEPHEN W. BRUCCOLERI

BY 

Salvatore LaRussa Jr., Esquire  
Attorney for Plaintiffs,  
Kevin Jackson and  
Donna Jackson, h/w.

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VERIFICATION

I, Ugen Jackson, hereby states that he is the Plaintiff herein; that the Complaint in Civil Action contained therein are true and correct to the best of his knowledge, information and belief; and that this statement is made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

DATE: 8/5/13

Ugen Jackson

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